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July 20, 2005

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When calling relative to this
matter, refer to file No. 1281.

Honorable James H. Welsh
Commissioner of Conservation
Office of Conservation
P. O. Box 94275
Baton Rouge, Louisiana 70804-9275

RE: **Smackover C Zone
Reservoir B
North Shongaloo-Red Rock Field
Webster Parish, Louisiana**

APPLICATION FOR PUBLIC HEARING

Dear Sir:

Will-Drill Production Co., Inc. hereby makes application pursuant to the revised rules of procedure for a public hearing to consider evidence relating to the following matters pertaining to the Smackover C Zone, Reservoir B, in the North Shongaloo-Red Rock Field, Webster Parish, Louisiana:

1. To permit Will-Drill Production Co., Inc. to drill, designate and utilize the two additional alternate unit wells for SMK C RB SUD at the exceptional locations shown on the plat attached hereto and made a part hereof, in exception to the spacing provisions of Office of Conservation Order No. 104-H-4;
2. To establish that the proposed alternate unit wells are necessary to recover hydrocarbons underlying SMK C RB SUD that cannot be produced efficiently and economically from any other well located on the unit;
3. To authorize the unit allowable for SMK C RB SUD to be recovered from the existing unit well, the proposed alternate unit well, or any combination thereof, at the discretion of the operators;
4. To authorize Will-Drill Production Co., Inc. to report production from the two proposed additional alternate unit wells, the McEachern No. 2 and McKinney No. 1 Wells, as well as the current alternate unit well, the Will-Drill Production Co., Inc. - McEachern No. 1 Well, and to continue to authorize Cypress Operating, Inc., the

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operator of the SMK C RB SUD; McEachern No. 1 Well (the unit well for SMK C RB SUD), to report production from said well separately;

5. To consider and cover such other matters as the Commissioner of Conservation may deem appropriate and necessary under the circumstances.

The Smackover C Zone, Reservoir B in the North Shongaloo-Red Rock Field, Webster Parish, Louisiana, was fully defined in Office of Conservation Order No. 104-H-4, effective on and after June 24, 1986.

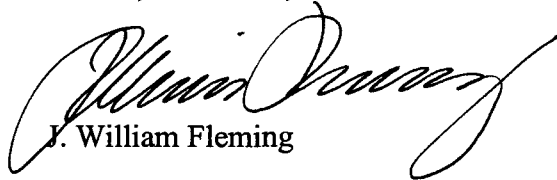
The subject matter of this application does not require the issuance of a pre-application notice.

Any pertinent data relating to this matter can be obtained, at the cost of the requesting party, from Mr. Mike Fulford, Will-Drill Production Co., Inc., 416 Travis Street, Suite 1200, Shreveport, Louisiana 71101, telephone number (318) 222-7464.

The attached list includes the names of all Interested Owners, Represented Parties and Interested Parties known to applicant after a diligent search and a copy of this notice, with plat attached, is being sent to each such party. Pursuant to Office of Conservation regulations, such list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Shreveport District of the Office of Conservation; however, the list of parties will be provided to any person requesting a copy of it. Also enclosed is the application fee herein.

Yours very truly,

COOK, YANCEY, KING & GALLOWAY



J. William Fleming

jwf:s

Enclosures

cc: James C. Broussard, District Manager
Interested Owners, Represented
Parties and Interested Parties

